

Before the
FEDERAL COMMUNICATIONS COMMISSION
445 12th St., S.W.
Washington, DC 20554

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In the Matter of)
)
Recommended TRS Cost Recovery Guidelines;)
Telecommunications Relay Services for)
Individuals with Hearing and Speech Disabilities)

CC Docket No. 98-67

COMMENTS OF COMMUNICATION SERVICE FOR THE DEAF

Communication Service for the Deaf ("CSD") respectfully submits its comments on the above-captioned applications (pursuant to Public Notice DA# 00-2739 released December 6, 2000) as proposed by the Interstate Fund Advisory Council and the TRS Fund Administrator. The following comments are limited specifically to cost recovery guidelines as they pertain to video relay services ("VRS").

As a private, non-profit organization, CSD views the VRS from a unique perspective. CSD, both in partnership and as a primary contractor, provides traditional TRS services in twenty-seven states. CSD also, through its successful experience with the TRS, facilitates VRS services in other areas of the United States. Accordingly, CSD is in the unique position of being one of the few dual providers of TRS and VRS in the United States.

We agree that VRS will provide an excellent opportunity for consumers with hearing and speech disabilities to access and utilize telecommunications using the most advanced video conferencing technology available. However due to the nature of VRS, it will be considerably more expensive to provide compared to the traditional TRS. This is especially true if one applies the same minimum standards to both the VRS and TRS. In point of fact, there are fundamental

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differences between the two services that warrant special consideration. The hard/software needs alone needed to implement the VRS on a wide scale requires substantial up-front costs. Some of the technology needed to do this efficiently has yet to be developed. Additionally, labor costs associated with the start up and maintenance of a VRS center would also be significant. Comparatively speaking, labor costs could be roughly 500-700 % more than traditional relay services. If the Commission could implement measures to minimize these costs and maximize the recovery of related expenses -- other VRS providers would certainly be encouraged to enter the market creating more competition, new product development, greater innovation, superior service and overall lower costs.

VRS is dramatically different from the traditional TRS in the sense that video technology is involved and most importantly, proficient sign language interpreters are far more difficult to recruit, hire and retain compared to the availability of Communication Assistants ("CAs"). The current supply and demand, or more succinctly, the lack of such professionals, constitutes much higher wages and more generous benefits. IP, ISDN, POTS connections and switches for video that handle all three dial-up options are not readily available in today's marketplace. Such solutions will require more development, trials and testing. Inasmuch as standards and compliance issues concerning interconnection, blocking, answer times, E-911, 900 tracking, etc... fail to meet cost-benefit tests, CSD believes that the VRS is still a viable option in the TRS industry and well worth pursuing. We remain confident that, modifying some of the current standards and re-evaluating the reimbursement rates and mechanisms will inevitably create a VRS network that are as accessible and desirable as current TRS services and a major force in telecommunications services throughout the United States.

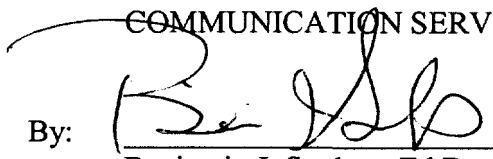
A flat monthly payment based on an assumed number of minutes may initially help to recover up-front costs within a reasonable period. The ability to realize economies of scope in a shorter period of time would entice relay providers to invest in VRS platforms. As call volumes continue to increase, a cost per minute rate could eventually be calculated. This would be similar to what is in place today for traditional relay services. Also, creating minimal standards for VRS -- aside from current relay standard requirements -- would create greater opportunities to develop or grow the service over a length of time. Standards could then be increased gradually as VRS products continue to enhance. TRS minimum standards were raised to a higher level this past year after seven years of initial requirements. This was done after the basic needs and dynamics of the service were realized. Similarly, VRS should have a starting point with an opportunity to develop over time. Current TRS requirements are appropriate for traditional relay services but they may be unrealistic for VRS. We believe that viewing the VRS as a completely separate relay platform with different standards, rates, reimbursement mechanisms, etc. will greatly affect its success.

Thank you for the opportunity to respond.

Respectfully submitted,

COMMUNICATION SERVICE FOR THE DEAF

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